



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAY 29 2002

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: National Remedy Review Board Recommendations for OU 3 of the Maryland Sand, Gravel and Stone Superfund Site

FROM: Bruce K. Means, Chair *BK Means*
National Remedy Review Board

TO: Abe Ferdas, Director
Hazardous Site Cleanup Division
EPA Region 3

Purpose

The National Remedy Review Board (NRRB) has completed its review of the proposed cleanup action to address OU 3 of the Maryland Sand, Gravel and Stone Superfund Site in Elkton, MD. This memorandum documents the NRRB's advisory recommendations.

Context for NRRB Review

The Administrator announced the NRRB as one of the October 1995 Superfund Administrative Reforms to help control response costs and promote consistent and cost-effective decisions. The NRRB furthers these goals by providing a cross-regional, management-level, "real time" review of high cost proposed response actions prior to their being issued for public comment. The board reviews all proposed cleanup actions that exceed its cost-based review criteria.

The NRRB review evaluates the proposed actions for consistency with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and relevant Superfund policy and guidance. It focuses on the nature and complexity of the site; health and environmental risks; the range of alternatives that address site risks; the quality and reasonableness of the cost estimates for alternatives; regional, state/tribal, and other stakeholder opinions on the proposed actions, and any other relevant factors.

Deliberative - Do Not Quote Or Cite - Deliberative

Generally, the NRRB makes advisory recommendations to the appropriate regional decision maker. The region will then include these recommendations in the administrative record for the site, typically before it issues the proposed response action for public comment. While the region is expected to give the board's recommendations substantial weight, other important factors, such as subsequent public comment or technical analyses of response options, may influence the final regional decision. The board expects the regional decision maker to respond in writing to its recommendations within a reasonable period of time, noting in particular how the recommendations influenced the proposed cleanup decision, including any effect on the estimated cost of the action. It is important to remember that the NRRB does not change the Agency's current delegations or alter in any way the public's role in site decisions.

Overview of the Proposed Action

The Maryland Sand, Gravel and Stone Superfund Site is a former sand and gravel quarry that was used for the disposal of waste processing water, still bottoms, sludge and drummed wastes. These disposal activities resulted in the contamination of surface and subsurface soils and ground water, primarily with volatile organic compounds.

The proposed cleanup action includes the excavation and on-site treatment by low-temperature thermal desorption (LTTD) of approximately 30,000 cubic yards of contaminated soil, the expansion and continued operation of an existing shallow groundwater recovery and treatment system, and the enhancement of naturally occurring processes for the biodegradation of groundwater contaminants. A small volume of contaminated soil and waste material which would not be effectively treated on-site would be transported to off-site facilities for appropriate treatment and/or disposal. Temporary institutional controls would prevent activities that would adversely affect the groundwater recovery system and would restrict the use of ground water until the groundwater cleanup levels are attained.

NRRB Advisory Recommendations

The NRRB reviewed the information packages supporting this proposal on April 24, 2002, and discussed related issues with Debra Rossi (EPA Remedial Project Manager) and Pete Ludzia (Chief, EPA General Remedial Section). Based on this review and discussion, the board offers the following comments:

- The board notes that the region's package and cost estimate do not address fully whether certain RCRA requirements (e.g., Subpart O) would be ARAR for the proposed remedy. As this determination is dependent upon the LTTD unit design, the board recommends that the region pay close attention to this issue as it may affect the implementability and cost of the remedy substantially. The results of this analysis should be presented clearly in the decision documents for the site.
- The region proposes to achieve groundwater cleanup standards in the Upper Sand lithologic unit by enhancing the naturally occurring processes for biodegradation of contaminants through the addition of inorganic nutrients, organic carbon and/or microbial cultures to the saturated zone. The board notes that the site contaminants degrade by

both aerobic and anaerobic processes. The board recommends that treatability studies be conducted during design to assess the effectiveness of enhanced microbial activity. If significant contaminant degradation is observed, additional studies should be conducted to optimize the performance potential of the proposed biodegradation component of the remedy.

- The site package reports that non-aqueous phase liquid (NAPL) was observed in two locations on the site. The board recommends that during remedy implementation, the region take care to confirm dense NAPL and/or light NAPL locations and remove and/or treat any NAPL to the extent practicable in order to address these potential sources of groundwater contamination and reduce the groundwater restoration timeframe.
- The board notes that the State of Maryland did not participate in the meeting or submit comments to the board in support of its deliberations. Input from the state would have been helpful to the board in reviewing the region's cleanup proposal.

The NRRB appreciates the regions efforts in working together with responsible parties, the state, and community groups at this site. We encourage Region 3 management and staff to work with their regional NRRB representative and the Region 3/8 Accelerated Response Center in the Office of Emergency and Remedial Response to discuss any appropriate followup action.

Thank you for your support and the support of your managers and staff in preparing for this review. Please call me at 703-603-8815 should you have any questions.

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